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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

FATHI ABDULRAHIM HARARA and  
NATIVE GROUNDS, LLC, d/b/a  
JERUSALEM COFFEE HOUSE,

Defendants.

CASE NO. 3:25-CV-04849-SI

Coordinated with

CASE NO. 4:25-CV-02060

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO AMEND CASE  
MANAGEMENT ORDER**

At midnight on September 30, 2025, the appropriations act that had been funding the Department of Justice expired and appropriations to the Department lapsed. On October 31, 2025, the parties jointly requested a stay of the litigation, *Dkt.* 32, which the Court granted on the same date, *Dkt.* 33. The Court ordered the United States to “promptly notify the Court as soon as the government shutdown has ended and confer with opposing counsel submit within two weeks a revised joint proposed schedule, including rescheduling the parties’ case management conference currently scheduled for November 14, 2025.” *Dkt.* 33.

Appropriations were restored on the evening of November 12, 2025, for a total lapse of 43 days. On November 17, 2025, the United States timely notified the Court that appropriations had been restored and that the United States would confer with counsel and file a proposed case management order on or before November 26, 2025.

The United States conferred with Defendants’ counsel as well as counsel for Plaintiff in the related case, *Radice v. Jerusalem Boxing Club, LLC et al.*, Case No. 3:25-cv-02060. Given the time lost due to the lapse in appropriations, the parties have stipulated to the following proposed schedule:

Event	Current Date	Proposed Date
Expert Disclosures	December 15, 2025	January 15, 2026

Expert Rebuttal Disclosures	January 15, 2026	February 16, 2026
Close of Discovery	February 28, 2026	NO CHANGE
Dispositive Motions	March 31, 2026	NO CHANGE
Opposition Briefs	April 26, 2026	NO CHANGE
Reply Briefs	May 5, 2026	NO CHANGE
Final Pretrial Conference	July 10, 2026	NO CHANGE
Trial Begins	On or after July 27, 2026	NO CHANGE

The proposed change to expert discovery deadlines is limited and does not affect other deadlines in the case.

DATED: December 5, 2025

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